

EXHIBIT C

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21 *Co-Lead Counsel for Plaintiffs*

22
23 IN THE UNITED STATES DISTRICT COURT

24 FOR THE NORTHERN DISTRICT OF CALIFORNIA

25
26 IN RE: UBER TECHNOLOGIES, INC.,
27 PASSENGER SEXUAL ASSAULT
LITIGATION

28 Case No. 3:23-md-03084-CRB (LJC)

This Document Relates to:

STIPULATION AND [PROPOSED] ORDER
TO RESET PRETRIAL DEADLINES

ALL WAVE 1 BELLWETHER CASES

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6-17th Floor

22 WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1
23 Case Assignments and Discovery Schedule;

24 WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by
25 August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and
26 Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert
27 reports by September 22, 2025 [ECF 3533]; and was further modified by Stipulation and Court Order

1 to require the parties to submit expert reports by August 29 and rebuttal expert reports by September
2 29 [ECF 3705];

3 WHEREAS, at the August 22, 2025 Case Management Conference, the Court informed the
4 parties that the first bellwether trial will begin on January 6, 2026, rather than December 8, 2025 [ECF
5 3725];

WHEREAS, Pretrial Order No. 26 was further modified by Stipulation and Court Order to require the parties to submit expert reports by September 12, 2025 and rebuttal expert reports by October 13, 2025 [ECF 3757];

9 WHEREAS, the parties agree that an additional extension of the expert disclosure deadlines is
10 necessary, and that they will meet and confer on adjustments to the remainder of the pretrial schedule;

WHEREAS, given the additional time made available by the new trial date, the parties agree that pretrial deadlines for the disclosure of expert reports in the five Wave 1 cases that have substantially completed fact discovery should be modified as follows:

- Expert Reports: September 26, 2025
- Rebuttal Reports: October 24, 2025

16 THEREFORE, the parties respectfully request the Court enter the parties' stipulation and
17 that the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533, 3705, and 3757
18 be extended as follows:

For B.L., A.R.2, Dean, LCHB128, and WHB 823:

- Expert Reports: September 26, 2025
- Rebuttal Reports: October 24, 2025

IT IS SO STIPULATED.

25 DATED: September 10, 2025 Respectfully submitted,

By: /s/ Sarah R. London

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24 Dated: September 10, 2025

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2 *Attorneys for Defendants*
3 UBER TECHNOLOGIES, INC.,
4 RASIER, LLC, and RASIER-CA, LLC
5

6 **ATTESTATION**
7

8 Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose
9 behalf the filing is submitted, concur in the filing's consent and have authorized the filing.
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11 Dated: September 10, 2025
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13 _____
14 /s/ *Sarah R. London*
15 Sarah R. London
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1 **[PROPOSED] ORDER**
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5 **IT IS SO ORDERED.**
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Dated: September 11, 2025



Honorable Charles R. Breyer
United States District Judge